

33559



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

APR 12 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. J. Bradford McIlvain  
Reed Smith Shaw & McClay  
1600 Avenue of the Arts Building  
Broad and Chestnut Streets  
Philadelphia, Pa. 19107-3426

Dear Mr. McIlvain,

This correspondence is in furtherance of EPA's ongoing investigation concerning the Revere Chemical Site. As you were made aware in previous letters, the site was operated by the Revere Chemical Company, the DeRewal Chemical Company, and Echo Incorporated. Christopher B. Pilla of my staff, has recently been assigned the responsibility of continuing EPA's investigation in this matter, and has completed a review of the NVE file.

Upon review of the NVE file additional inquiry concerning NVE has been deemed appropriate. Prior to setting forth the questions identified, EPA would like to first set forth its position with respect to copper, categorized in your 10/21/87 letter as inert. In the context of the Revere Chemical site, copper is indeed a hazardous waste which exhibits both toxic and persistent characteristics. The characterization as "inert" is clearly not representative of conditions at the Revere chemical site.

Be advised that failure or refusal to comply with this request within the specified period is a violation of Federal law which may result in further enforcement action including, but not limited to, civil penalties of up to \$25,000 per day of violation, and criminal fines of up to \$50,000 per day and/or imprisonment of up to two years, as stipulated in 42 U.S.C. Sections 6928 (c), (d) and (g). In addition EPA may initiate a judicial action to compel you to respond.

APR 20 1988

Information Requested

1) NVF'S 10/21/87 correspondence indicates that records reviewed for 1969 and 1970 pertaining to waste haulers who would have removed the NVF generated sheet scrap, do not indicate that the scrap material went to the Revere site. Did the records reviewed reflect the identity of the disposition facility or simply the identity of the scrap hauler?

2) Identify all customers and provide customer list of laminated board up to 1971.

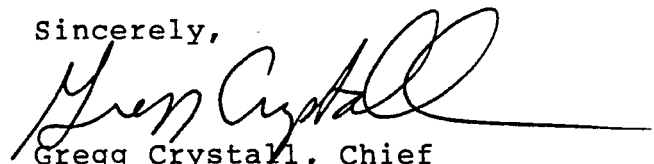
All information and documents requested are due to the address listed below within 15 calendar days of receipt of this letter:

Christopher B. Pilla  
U.S. Environmental Protection Agency  
PA CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Street  
Philadelphia, Pa. 19107

Thank you for your cooperation in this matter. If you have any questions concerning this correspondence, please contact Christopher B. Pilla of my staff at 215-597-8216.

This information collection request is not subject to the Office of Management and Budget review under the Paperwork Reduction Act, 44 U.S.C. Sections 3501-3520.

Sincerely,

  
Gregg Crystall, Chief  
PA CERCLA Remedial Enforcement  
Section

cc: D.Snyder, PADER  
M.Barden, Esquire

AR200433

*Copies given*

APR 12 1988

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AR200434

Information Requested

1) NVF'S 10/21/87 correspondence indicates that records reviewed for 1969 and 1970 pertaining to waste haulers who would have removed the NVF generated sheet scrap, do not indicate that the scrap material went to the Revere site. Did the records reviewed reflect the identity of the disposition facility or simply the identity of the scrap hauler?

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Sincerely,

Gregg Crystall, Chief  
PA CERCLA Remedial Enforcement  
Section

cc: D.Snyder, PADER ✓  
M.Barden, Esquire ✓

AR200435

